

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

UNITED STATES OF AMERICA)	CRIM. NO. 7:23-cr-00900-TMC
)	
vs.)	MOTION TO CONTINUE
)	
DA RON COLLINS)	
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NOW COMES the Defendant, Da Ron Collins, by and through his attorney, and respectfully moves this Court to continue this case to the next term of court. The Defendant made his initial appearance in court on November 16, 2023, in the District of South Carolina. At that time AFPD Lora Blanchard of the Federal Public Defender's Office was appointed as defense counsel (ECF Nos. 12 & 13). On January 31, 2024, a Status Conference was held before US Magistrate Judge Kevin McDonald regarding a possible conflict with AFPD Blanchard in this case. As such, AFPD Blanchard was relieved as counsel and undersigned counsel was appointed to represent Defendant Collins (ECF Nos.38-40). On March 27, 2004, undersigned counsel made an Oral Motion to Continue which was unopposed by the government and granted by this Honorable Court (ECF No 43).

Defense counsel needs additional time to meet with and coordinate strategy of this unique and legally complex case with Client's attorney of record in a parallel and factually similar State of South Carolina General Sessions case which is currently pending in Spartanburg, South Carolina. Additionally undersigned counsel needs additional time to interview and investigate potential witnesses Client recently identified to undersigned counsel who may have relevant information of value to the defense.

Defense counsel contends the granting of this continuance would not be prejudicial to either the government or to the Defendant and will be excludable under the provisions of 18 U.S.C. §3161(h)(7)(A) on the basis of findings that the ends of justice served by taking such action outweigh the best interest of the public and the Defendant in a speedy trial.

On May 6, 2024, defense counsel met with the Defendant in person at the Anderson City Jail, advised him of his right to a speedy trial, and specifically advised him that by requesting or consenting to this continuance, Defendant would be waiving his right to a speedy trial. Understanding this, Defendant Collins makes this request for a continuance and waives his right to a speedy trial. Earlier today defense counsel attempted to consult with Assistant United States Attorney Leesa Washington, to obtain her consent or objection to this motion. However, undersigned counsel was unsuccessful in that attempt. Candidly, undersigned counsel believes had he been successful in communicating with AUSA Washington about her position on this Motion to Continue, AUSA Washington would likely object.

Respectfully submitted,

s/ J. Bradley Bennett (Fed. Bar # 8011)
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May 8, 2024
Greenville, South Carolina